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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

HECTOR LEONARD JARDINE,

Petitioner(s),

vs.

BRIAN WILLIAMS, *et al.*,

Respondent(s).

Case No. 2:16-cv-02637-RFB-NJK

**UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME TO ANSWER
THE REMAINING CLAIMS IN JARDINE'S
AMENDED PETITION FOR WRIT OF
HABEAS CORPUS
(FIRST REQUEST)**

Respondents, by and through counsel, Aaron D. Ford, Attorney General of Nevada, and Gerri Lynn Hardcastle, Deputy Attorney General, move this Court for an enlargement of time of sixty days, or up to and including Tuesday, June 13, 2023, to file and serve their answer to the remaining claims in Petitioner Hector Jardine's (Jardine) amended petition for writ of habeas corpus. ECF No. 28.

This motion is based on the provisions of Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure and the attached declaration of counsel, as well as all other pleadings and papers on file herein.

This is Respondents' first request for an enlargement of time to file and serve their answer to the remaining claims in Jardine's amended petition. Respondents make this motion in good faith and not for the purpose of unnecessary delay.

RESPECTFULLY SUBMITTED this 13th day of April, 2023.

AARON D. FORD
Attorney General

By: /s/ Gerri Lynn Hardcastle
GERRILYNN HARDCASTLE (Bar No. 13142)
Deputy Attorney General

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UNITED STATES DISTRICT COURT
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**DECLARATION OF COUNEL (IN SUPPORT
OF UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME TO ANSWER
THE REMAINING CLAIMS IN JARDINE'S
AMENDED PETITION FOR WRIT OF
HABEAS CORPUS (FIRST REQUEST))**

I, Gerri Lynn Hardcastle, hereby state, based on personal knowledge and/or information and belief, that the assertions in this declaration are true:

1. I am a Deputy Attorney General in the Post-Conviction Division of the Nevada Attorney General's Office, and I am assigned to represent Respondents in this matter. I make this declaration in support of Respondents' unopposed motion for enlargement of time to answer.

2. By this motion, I am requesting an enlargement of time of sixty days, or up to and including Tuesday, June 13, 2023, to answer the remaining claims in Jardine's amended petition. ECF No. 28. This enlargement of time is necessary for me to effectively represent the Respondents' interests. This is my first request for an enlargement of time to answer.

3. The answer is due tomorrow, April 14, 2023.

4. I am unfortunately unable to complete the answer in accordance with the Court's deadline. In addition to completing customary day-to-day tasks, I have been extraordinarily busy recently because the Post-Conviction of the Office of the Attorney General is understaffed by two

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1 deputies. I have consequently become responsible for several additional cases, and these
2 responsibilities prevent me from completing the answer.

3 5. I exchanged emails with Assistant Federal Public Defender Margaret Lambrose earlier
4 today, and she does not oppose the proposed enlargement of time.

5 6. This motion for enlargement of time is made in good faith and not for the purpose of
6 unduly delaying the ultimate disposition of this case.

7 7. Pursuant to 28 U.S.C. § 1746, I hereby certify, under penalty of perjury, that the
8 foregoing is true and correct.

9 RESPECTFULLY SUBMITTED this 13th day of April, 2023.

10 AARON D. FORD
11 Attorney General

12 By: /s/ Gerri Lynn Hardcastle
13 GERRI LYNN HARDCASTLE (Bar No. 13142)
14 Deputy Attorney General

15 IT IS SO ORDERED.

16 Dated this 17th day of April, 2023.

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19 RICHARD F. BOULWARE, II
20 UNITED STATES DISTRICT JUDGE
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CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General and that on this 13th day of April, 2023, I served a copy of the foregoing **UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO ANSWER THE REMAINING CLAIMS IN JARDINE’S AMENDED PETITION FOR WRIT OF HABEAS CORPUS (FIRST REQUEST)** by U.S. District Court CM/ECF electronic filing to:

Margaret Lambrose
Amelia L. Bizzaro
Assistant Federal Public Defender
411 E. Bonneville Ave. Ste. 250
Las Vegas, Nevada 89101

/s/ April Markiewicz